

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

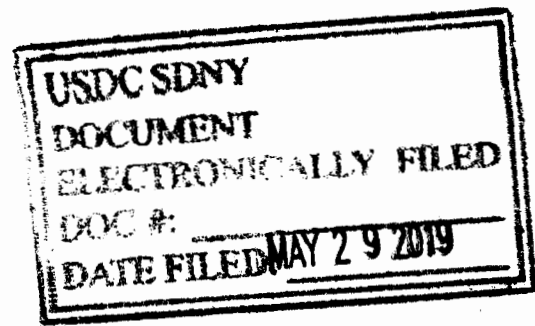
CORALYN GRUBBS, LOUIS SMITH, ALI
RIVERA, and SEAN MILLER, individually and
on behalf of all other persons similarly situated,

Plaintiffs,

v.

LEE BROWN, in his official capacity as Police
Commissioner of the City of New York; NEW
YORK CITY POLICE DEPARTMENT;
GERALD MITCHELL, in his official capacity as
Acting Commissioner of Correction of the City of
New York; NEW YORK CITY DEPARTMENT
OF CORRECTION; DAVID DINKINS, in his
official capacity as Mayor of the City of New
York; THE CITY OF NEW YORK; MATTHEW
T. CROSSON, in his official capacity as Chief
Administrator of the Courts; and MILTON L., in
his official capacity as Deputy Chief
Administrative Judge of the New York City
Courts

Defendants.



No. 92-CV-2132
(GBD)

STIPULATION AND
[REDACTED] ORDER

SO ORDERED
The status conference is adjourned
from June 04, 2019 to August 6, 2019
at 9:45 a.m.

George B. Daniels
HON. GEORGE B. DANIELS

WHEREAS, at the January 22, 2019 Status Conference, this Court set the following
schedule for discovery and briefing:

1. March 15, 2019, Plaintiffs to (1) provide non-expert affidavits; (2) disclose identity of expert(s), provide their CVs and identify broadly the issues they will be opining upon; and (3) notice depositions for non-expert witnesses other than those to be identified by the Defendants, providing deposition topics.
2. April 5, 2019, Defendant City of New York ("Defendant") to decide whether to provide any non-expert witness affidavits to rebut the plaintiffs' non-expert

witnesses. If so, it must identify such witnesses and either identify issues or produce an affidavit.

3. April 19, 2019, Plaintiffs' expert report(s) due.
4. April 30, 2019, completion of non-expert witness depositions.
5. May 23, 2019, Defendant's expert report(s) due.
6. June 4, 2019, Status Conference, 9:45 am.
7. June 28, 2019, completion of expert depositions.
8. July 31, 2019, Plaintiffs' opening brief due.
9. August 30, 2019, Defendants' opposition brief due.
10. September 20, 2019, Plaintiffs' reply brief due.¹

WHEREAS Plaintiffs and Defendant (together, the "parties") agree that certain portions of the foregoing discovery and briefing dates should be modified;

WHEREAS this is the parties' first request for a modification of the foregoing discovery and briefing dates; and

WHEREAS both parties reserve the right to seek a further extension of the discovery schedule set forth below depending on the outcome of any motion(s) to exclude the other party's expert report(s);

IT IS HEREBY STIPULATED AND AGREED by and between the parties that the discovery schedule shall be modified as follows:

1. June 14, 2019, completion of non-expert witness depositions.
2. June 7, 2019, Plaintiffs' expert reports due.

¹ Although the Court stated that briefing should be completed by September 10th, this date was apparently erroneous because the Court stated that Plaintiffs should have 20 days to reply. (Jan. 22 Hr. Tr. 52:6-7)

3. July 12, 2019, Defendant's rebuttal expert reports, and any motions to exclude Plaintiffs' experts, due.
4. August 9, 2019, completion of expert depositions.
5. August 16, 2019, any motions to exclude Defendants' expert(s) due.
6. September 6, 2019, Plaintiffs' opening brief due.
7. October 4, 2019, Defendant's opposition brief due.
8. October 24, 2019, Plaintiffs' reply brief due.

Dated: 5/17, 2019
New York, New York

WHITE & CASE
Attorneys for Plaintiffs
1221 Avenue of the Americas
New York, New York 10020
(212) 819-8200
cwest@whitecase.com

By: Colin West
Colin T. West

ZACHARY CARTER
Corporation Counsel of the City of New York
Attorney for Defendant City of New York
100 Church Street, Room 2-192
New York, New York 10007
(212) 356-0893
ckruk@law.nyc.gov

By: CK 5/15/19
Carolyn Kruk

LEGAL AID SOCIETY
Attorney for Plaintiffs
199 Water Street, 6th Floor
New York, New York 10038
(212) 577-3265
CConti-Cook@legal-aid.org

By: Cynthia Conti-Cook
Cynthia Conti-Cook

SO-ORDERED:

Dated: MAY 29 2019

George B. Daniels
Hon. George B. Daniels, U.S.D.J.